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Huntington Williams, III, *President*

April 2, 2002

Ms. Magalie Roman Salas, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: Comments Submitted by the Office of the Michigan Information Network Pertaining to [CC Docket No. 02-6] Schools and Libraries Universal Service Support Mechanism

Dear Ms. Salas:

Merit Network, Inc. supports the attached comments submitted to the FCC by the Office of the Michigan Information Network (MIN), in collaboration with the Michigan Department of Education, the Library of Michigan, and other Michigan organizations involved in the E-rate program.

Merit Network, Inc. supports the MIN's statement that in order to improve operations, ensure equitable distribution of program funds, prevent fraud, waste, and abuse, and make working with the E-rate program easier and more convenient for all parties, changes in program rules are necessary. We concur with the MIN recommendations for changes to the application process, payment options and other post-funding commitment issues, appeals, audits, unused funds, and specific outmoded administrative and procedural rules as proposed in the above referenced comments to the FCC. Our support of both the comments and recommendations reflect our collaboration in preparing the response document.

Merit provides Internet access service to many school districts and library cooperatives in Michigan. These organizations have benefited from the E-rate program over the past four years. However, charter and private schools and smaller independent schools and libraries, especially those in remote and economically disadvantaged areas, benefit very little or not at all due to the lengthy, complicated, and confusing application process, restrictive payment options, and the inability to make changes during the funding cycle when events occur out of the applicant's control e.g., changes in service providers. The recommendations provided in the MIN comments document address some of these critical issues.

We believe the FCC will give serious consideration to making the recommended changes so that all schools and libraries will benefit from the program.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sara J. Peth".

Sara J. Peth
MichNet Sales Consultant

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